



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 4, 2020

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU005521-ZHU005524** - Finalized translation of a Bulgarian official report regarding the search of the defendant's apartment.
- **ZHU005535-ZHU005542** – Finalized translation of records pertaining to a bank account in Bulgaria controlled by the defendant.
- **ZHU005543 – ZHU005548** – Finalized translations of documents seized from the defendant's apartment.
- **ZHU005549 – ZHU005577** – Finalized translation of bank records pertaining to an account in Bulgaria controlled by the defendant.
- **ZHU005578-ZHU005841** – Finalized translation of bank records regarding an account in the Czech Republic controlled by the defendant.
- **ZHU005923 – ZHU005930** – Finalized translations of documents from the defendant's iCloud account.
- **ZHU005934-ZHU005935** – Finalized translations of images from the defendant's mobile devices.
- **ZHU005936-ZHU006046** – Finalized translations of records pertaining to a bank account in Latvia controlled by the defendant.
- **ZHU006047-ZHU006050** – finalized translations of files from the defendant's mobile devices.

- **ZHU006051-ZHU006314** - Finalized translations of records pertaining to a bank account controlled by the defendant in the Czech Republic.
- **ZHU006315-ZHU006330** – Finalized translations of records pertaining to a bank account controlled by the defendant in Bulgaria.
- **ZHU006331-ZHU006433** – Finalized translations of records pertaining to a bank account controlled by the defendant in Latvia.
- **ZHU006434** – Finalized translations of Skype chats from the defendant's laptop computer.
- **ZHU006435** - Finalized translations of Jabber chats from the defendant's laptop computer.

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU005520** – Records produced by an online platform.
- **ZHU005842 – ZHU005922** – Finalized translations of emails.
- **ZHU005931 – ZHU005933** – Finalized translations of emails.

The following material produced under cover of this letter is designated **attorneys' eyes only** pursuant to the protective order issued by the Court on July 31, 2019:

- **ZHU00517** - Records produced by an advertising agency.
- **ZHU005518** – Records produced by an advertising agency.
- **ZHU005519** – Records produced by an advertising agency

The government also requests reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander Mindlin
Alexander Mindlin
Assistant U.S. Attorney
(718) 254-6433

Enclosures

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)